

1 BRETT B. CURLEE (SBN 151058)
LAW OFFICES OF BRETT CURLEE
2 11377 W. Olympic Blvd., Suite 200
Los Angeles, CA 90064
3 Telephone: (310)203-3084
Facsimile: (310) 203-3071
4 Email: Brett.Curlee@TheCurleeLawFirm.com

5 Attorney for the Movant and Chapter 7
Trustee, WESLEY H. AVERY

6 UNITED STATES BANKRUPTCY COURT
7
8 CENTRAL DISTRICT OF CALIFORNIA
9
10 LOS ANGELES DIVISION

11 In re LETITIA LOUISE WELLINGTON,) Case No. 2:17-bk-23651-NB
12)
13 Debtor.) [Chapter 7]
14) DECLARATION OF BRETT B.
15) CURLEE RE: SERVICE OF ORDER
16) TO SHOW CAUSE WHY AMOS Q.
17) WELLINGTON, KOUSHA BEROKIM,
18) AND BEROKIM & DUEL, P.C.
19) SHOULD NOT BE HELD IN CIVIL
20) CONTEMPT OF COURT (FRBP
21) 9020)
22)
23) Date: November 27, 2018
24) Time: 11:00 a.m.
25) Place: Courtroom 1545
26) Edward R. Roybal Federal
27) Building And Courthouse
28) 255 E. Temple Street
Los Angeles, CA 90012-3300

DECLARATION OF BRETT B. CURLEE

I, BRETT B. CURLEE, declare and state as follows:

1. I am the attorney for the Movant and Chapter 7 Trustee, Wesley H. Avery ("Trustee"), in the bankruptcy case In re: Letitia Louise Wellington, Bankr. Case No. 2:17-bk-23651-NB (Chapter 7) ("Bankruptcy Case" or "Estate"). I have personal knowledge of the facts stated in this declaration. If called as a witness, I would competently testify to the facts stated below.

2. On November 1, 2018, I caused to be filed the "Motion for Issuance of Order Directing Amos Q. Wellington, Kousha Berokim, and Berokim & Duel, P.C. to Show Cause why They should not be held in Civil Contempt of Court (FRBP 9020); Memorandum of Points and Authorities; Declarations of Brett B. Curlee and Wesley H. Avery in Support Thereof" (Docket No. 102") ("Motion") for the Trustee, and I lodged an Order thereon as demonstrated by the Notice of Lodgment of Order on the Motion (Docket No. 103).

3. The Court issued the Order on the Motion (Docket No. 104) ("Order") on November 2, 2018 and set the Motion for hearing at the above-referenced date and time and court location. The Order required the Trustee to serve a copy of the Order on Amos Q. Wellington, Kousha Berokim, and Berokim & Duel, P.C. by November 5, 2018, via overnight mail delivery.

4. On November 3, 2018, I traveled to the Rancho Park branch of the United States Post Office at 11270 Exposition Boulevard, Floor 1, Los Angeles, CA 90064-9998. I delivered the envelopes containing the Order for express mail delivery on Amos Q. Wellington, Kousha Berokim, and Berokim & Duel, P.C. Attached hereto as **Exhibit "1"** are the priority mail receipts showing the

1 addresses to which the envelopes containing copies of the Order
2 were delivered and showing the U.S. Postal Service completed
3 processing the envelopes containing the Orders at 3:41 p.m. on
4 Saturday November 3, 2018.

5 5. As the U.S. Postal Service does not deliver on Sunday,
6 all of the envelopes were designated for delivery on the next
7 business day, which was October 5, 2018, by noon. Attached
8 hereto as **Exhibit "2"** is a true and correct copy of the receipt
9 issued by the U.S. Postal Service, at 3:44 p.m. on November 3,
10 2018, that confirms both the processing of the envelopes
11 containing the Orders and the cost of express mail delivery.

12 5. On November 6, 2018, I confirmed online with U.S.
13 Postal Service that all of the envelopes containing the Order had
14 been delivered to the addresses for Amos Q. Wellington, Kousha
15 Berokim, and Berokim & Duel, P.C. before filing this declaration.

16 True and correct copies of the USPS Tracking Reports showing the
17 delivery of all of the envelopes containing the Order by noon on
18 November 5, 2018 are attached hereto as **Exhibit "3"**.

19 I declare under penalty of perjury under the laws of the
20 United States of America that the foregoing is true and correct
21 and that this declaration was executed this 6th day of November of
22 2018, at Los Angeles, California.

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25 Brett B. Curlee
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EXHIBIT “1”

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) **PHONE:** ()

Brett B. Curlee, Esq.
Law Offices of Brett Curlee
11377 W. Olympic Blvd.
Suite 200
Los Angeles, CA 90064

PAYMENT BY ACCOUNT (if applicable)
USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

DELIVERY OPTIONS (Customer Use Only)
☐ **SIGNATURE REQUIRED** Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.
Delivery Options
☒ No Saturday Delivery (delivered next business day)
☐ Sunday/Holiday Delivery Required (additional fee, where available)
☐ 10:30 AM Delivery Required (additional fee, where available)
*Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT) **PHONE:** ()

Kousha Burokim, Esq.
Burokim & Ducl, P.C.
270 N. Canon Drive Third Floor
Beverly Hills, CA 90210

ZIP + 4® (U.S. ADDRESSES ONLY)



EL 911100052 US



**UNITED STATES
POSTAL SERVICE®**

**PRIORITY
★ MAIL ★
EXPRESS™**

ORIGIN (POSTAL SERVICE USE ONLY)

☒ 1-Day ☐ 2-Day ☐ Military ☐ DPO

PO ZIP Code: 90064 Scheduled Delivery Date (MM/DD/YY): 11/5/18 Postage: \$ 24.70

Date Accepted (MM/DD/YY): 11/3/18 Scheduled Delivery Time: ☐ 10:30 AM ☐ 3:00 PM ☒ 12 NOON Insurance Fee: \$ COD Fee: \$

Time Accepted: 3:35 ☐ AM ☒ PM 10:30 AM Delivery Fee: \$ Return Receipt Fee: \$ Live Animal Transportation Fee: \$

Special Handling/Fragile: \$ Sunday/Holiday Premium Fee: \$ Total Postage & Fees: 24.70

Weight: ☐ Flat Rate ☒ L-2 Acceptance Employee Initials: L-2

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY) Time: ☐ AM ☐ PM Employee Signature: _____

Delivery Attempt (MM/DD/YY) Time: ☐ AM ☐ PM Employee Signature: _____

LABEL 11-B, OCTOBER 2016

PSN 7690-02-000-9996

2-CUSTOMER COPY

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) **PHONE:** ()

Brett B. Curlee, Esq.
Law Offices of Brett Curlee
11377 West Olympic Blvd.
Suite 200
Los Angeles, CA 90064

PAYMENT BY ACCOUNT (if applicable)
USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

DELIVERY OPTIONS (Customer Use Only)
☐ **SIGNATURE REQUIRED** Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.
Delivery Options
☒ No Saturday Delivery (delivered next business day)
☐ Sunday/Holiday Delivery Required (additional fee, where available)
☐ 10:30 AM Delivery Required (additional fee, where available)
*Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT) **PHONE:** ()

Amos W. Wellington
1353 Hauser Blvd.
Los Angeles, CA 90009

ZIP + 4® (U.S. ADDRESSES ONLY)



EL 911100066 US



**UNITED STATES
POSTAL SERVICE®**

**PRIORITY
★ MAIL ★
EXPRESS™**

ORIGIN (POSTAL SERVICE USE ONLY)

☒ 1-Day ☐ 2-Day ☐ Military ☐ DPO

PO ZIP Code: 90064 Scheduled Delivery Date (MM/DD/YY): 11/5/18 Postage: \$ 24.70

Date Accepted (MM/DD/YY): 11/3/18 Scheduled Delivery Time: ☐ 10:30 AM ☐ 3:00 PM ☒ 12 NOON Insurance Fee: \$ COD Fee: \$

Time Accepted: 3:36 ☐ AM ☒ PM 10:30 AM Delivery Fee: \$ Return Receipt Fee: \$ Live Animal Transportation Fee: \$

Special Handling/Fragile: \$ Sunday/Holiday Premium Fee: \$ Total Postage & Fees: 24.70

Weight: ☐ Flat Rate ☒ L-2 Acceptance Employee Initials: L-2

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY) Time: ☐ AM ☐ PM Employee Signature: _____

Delivery Attempt (MM/DD/YY) Time: ☐ AM ☐ PM Employee Signature: _____

LABEL 11-B, OCTOBER 2016

PSN 7690-02-000-9996

2-CUSTOMER COPY

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) **PHONE:** (310) 263-3084
Brett B. Curlee, Esq.
Law Offices of Brett Curlee
11377 W. Olympic Blvd.
Suite 200
Los Angeles, CA 90064

PAYMENT BY ACCOUNT (if applicable)
USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

DELIVERY OPTIONS (Customer Use Only)
☐ **SIGNATURE REQUIRED** Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.
Delivery Options
☒ No Saturday Delivery (delivered next business day)
☐ Sunday/Holiday Delivery Required (additional fee, where available)
☐ 10:30 AM Delivery Required (additional fee, where available)
*Refer to USPS.com® or local Post Office® for availability.

TO: (PLEASE PRINT) **PHONE:** ()
Amos Q. Wellington
PO BOX 351000
Los Angeles, CA 90035

ZIP + 4® (U.S. ADDRESSES ONLY)



EL 911100083 US



**PRIORITY
★ MAIL ★
EXPRESS™**

ORIGIN (POSTAL SERVICE USE ONLY)
☒ 1-Day ☐ 2-Day ☐ Military ☐ DPO

PO ZIP Code 90064 **Scheduled Delivery Date (MM/DD/YY)** 11/5/18 **Postage** \$ 24.70

Date Accepted (MM/DD/YY) 11/3/18 **Scheduled Delivery Time** ☐ 10:30 AM ☐ 3:00 PM ☒ NOON **Insurance Fee** \$ **COD Fee** \$

Time Accepted 3:30 PM **10:30 AM Delivery Fee** \$ **Return Receipt Fee** \$ **Live Animal Transportation Fee** \$

Special Handling/Fragile \$ **Sunday/Holiday Premium Fee** \$ **Total Postage & Fees** 24.70

Weight ☐ Flat Rate ☐ **Acceptance Employee Initials** **Employee Signature**

DELIVERY (POSTAL SERVICE USE ONLY)
Delivery Attempt (MM/DD/YY) **Time** ☐ AM ☐ PM **Employee Signature**

Delivery Attempt (MM/DD/YY) **Time** ☐ AM ☐ PM **Employee Signature**

LABEL 11-B, OCTOBER 2016

PSN 7890-02-000-9998

2-CUSTOMER COPY

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) **PHONE:** (310) 263-3084
Brett B. Curlee, Esq.
Law Offices of Brett Curlee
11377 W. Olympic Blvd.
Suite 200
Los Angeles, CA 90064

PAYMENT BY ACCOUNT (if applicable)
USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

DELIVERY OPTIONS (Customer Use Only)
☐ **SIGNATURE REQUIRED** Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.
Delivery Options
☒ No Saturday Delivery (delivered next business day)
☐ Sunday/Holiday Delivery Required (additional fee, where available)
☐ 10:30 AM Delivery Required (additional fee, where available)
*Refer to USPS.com® or local Post Office® for availability.

TO: (PLEASE PRINT) **PHONE:** ()
Berokim & Ducl, P.C.
c/o Kousha Berokim, Esq.
270 N. Canon Drive, Third Floor
Beverly Hills, CA 90210

ZIP + 4® (U.S. ADDRESSES ONLY)



EL 911100110 US



**PRIORITY
★ MAIL ★
EXPRESS™**

ORIGIN (POSTAL SERVICE USE ONLY)
☒ 1-Day ☐ 2-Day ☐ Military ☐ DPO

PO ZIP Code 90064 **Scheduled Delivery Date (MM/DD/YY)** 11/5/18 **Postage** \$ 24.70

Date Accepted (MM/DD/YY) 11/3/18 **Scheduled Delivery Time** ☐ 10:30 AM ☐ 3:00 PM ☒ NOON **Insurance Fee** \$ **COD Fee** \$

Time Accepted 3:41 PM **10:30 AM Delivery Fee** \$ **Return Receipt Fee** \$ **Live Animal Transportation Fee** \$

Special Handling/Fragile \$ **Sunday/Holiday Premium Fee** \$ **Total Postage & Fees** 24.70

Weight ☐ Flat Rate ☐ 1.2 **Acceptance Employee Initials** **Employee Signature**

DELIVERY (POSTAL SERVICE USE ONLY)
Delivery Attempt (MM/DD/YY) **Time** ☐ AM ☐ PM **Employee Signature**

Delivery Attempt (MM/DD/YY) **Time** ☐ AM ☐ PM **Employee Signature**

LABEL 11-B, OCTOBER 2016

PSN 7890-02-000-9998

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EXHIBIT “2”

RANCHO PARK
11270 EXPOSITION BLVD FL 1
LOS ANGELES
CA

90064-9998
0545500064

11/03/2018 (800)275-8777 3:44 PM

Product Sale Final
Description Qty Price

PM Exp 1-Day 1 \$24.70

Flat Rate Env
(Domestic)
(BEVERLY HILLS, CA 90210)
(Flat Rate)
(Signature Waiver)
(Scheduled Delivery Date)
(Monday 11/05/2018 12:00 PM)
(Money Back Guarantee)
(USPS Tracking #)
(EL911100052US)

PM Exp 1 \$0.00

Insurance
(Up to \$100.00 included)

PM Exp 1-Day 1 \$24.70

Flat Rate Env
(Domestic)
(LOS ANGELES, CA 90019)
(Flat Rate)
(Signature Waiver)
(Scheduled Delivery Date)
(Monday 11/05/2018 12:00 PM)
(Money Back Guarantee)
(USPS Tracking #)
(EL911100066US)

PM Exp 1 \$0.00

Insurance
(Up to \$100.00 included)

PM Exp 1-Day 1 \$24.70

Flat Rate Env
(Domestic)
(LOS ANGELES, CA 90035)
(Flat Rate)
(Signature Waiver)
(Scheduled Delivery Date)
(Monday 11/05/2018 12:00 PM)
(Money Back Guarantee)
(USPS Tracking #)
(EL911100083US)

PM Exp 1 \$0.00

Insurance
(Up to \$100.00 included)

PM Exp 1-Day 1 \$24.70

Flat Rate Env
(Domestic)
(BEVERLY HILLS, CA 90210)
(Flat Rate)
(Signature Waiver)
(Scheduled Delivery Date)
(Monday 11/05/2018 12:00 PM)
(Money Back Guarantee)
(USPS Tracking #)
(EL911100110US)

PM Exp 1 \$0.00

Insurance
(Up to \$100.00 included)

Total \$98.80

Credit Card Remitd \$98.80

(Card Name:VISA)
(Account #:XXXXXXXXXX1105)
(Approval #:00786C)
(Transaction #:917)
(AID:A0000000031010 Chip)
(AL:VISA CREDIT)
(PIN:Not Required CHASE VISA)

Includes up to \$100 insurance

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EXHIBIT “3”

USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: EL911100052US

Remove X

On Time

Expected Delivery on

MONDAY

5 NOVEMBER
2018 ⓘ

See Product Information ∨

Feedback

✓ **Delivered**

November 5, 2018 at 11:52 am
Delivered
BEVERLY HILLS, CA 90210

Get Updates ∨

Text & Email Updates



Proof of Delivery



Tracking History



Product Information



USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: EL911100066US

Remove X

Scheduled Delivery by

MONDAY

5 NOVEMBER 2018 ⓘ by **12:00pm** ⓘ

✓ **Delivered**

November 5, 2018 at 11:40 am
Delivered, In/At Mailbox
LOS ANGELES, CA 90019

Get Updates ∨

Feedback

Text & Email Updates



Proof of Delivery



Tracking History



Product Information



See Less ^

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USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: EL911100083US

Remove X

Scheduled Delivery by

MONDAY

5 NOVEMBER
2018 ⓘ **by**
12:00pm ⓘ

 **Delivered**

November 5, 2018 at 11:13 am
Delivered
LOS ANGELES, CA 90035

Get Updates ▼

Feedback

Text & Email Updates



Proof of Delivery



Tracking History



Product Information



See Less ^

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USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: EL911100110US

Remove X

On Time

Expected Delivery on

MONDAY

5 NOVEMBER
2018 ⓘ

See Product Information ▼

Feedback

✓ **Delivered**

November 5, 2018 at 11:52 am

Delivered

BEVERLY HILLS, CA 90210

Get Updates ▼

Text & Email Updates



Proof of Delivery



Tracking History



Product Information



-13-

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: Law Offices Of Brett Curlee, 11377 West Olympic Boulevard, Suite 200, Los Angeles, CA 90064

A true and correct copy of the foregoing document entitled: DECLARATION OF BRETT B. CURLEE RE: SERVICE OF ORDER TO SHOW CAUSE WHY AMOS Q. WELLINGTON, KOUSHA BEROKIM, AND BEROKIM & DUEL, P.C. SHOULD NOT BE HELD IN CIVIL CONTEMPT OF COURT (FRBP 9020) will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On November 6, 2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Chapter 7 Trustee: Wesley H Avery (TR)
wes@averytrustee.com,
C117@ecfcbis.com;lucy@averytrustee.com;alexandria@averytrustee.com
- Attorney for the Chapter 7 Trustee: Brett B Curlee
brett.curlee@thecurleelawfirm.com
- Attorney for the Debtor: Sanaz S Bereliani
berelianilaw@gmail.com,
chris@berelianilaw.com;r48595@notify.bestcase.com
- Creditor's Attorney: Michael F Chekian mike@cheklaw.com
- Creditor's Attorney: Stella A Havkin
stella@havkinandshrago.com,
havkinlaw@earthlink.net;r49306@notify.bestcase.com
- Creditor's Attorney: Merdaud Jafarnia
bknotice@mccarthyholthus.com, mjafarnia@ecf.inforuptcy.com
- United States Trustee: United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov
- Creditor's Attorney: Kristin A Zilberstein
ecfnotifications@ghidotttilaw.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On November 6, 2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or

adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Amos Q. Wellington
1353 Hauser Boulevard
Los Angeles, CA 90039

Amos Q. Wellington
PO Box 351000
Los Angeles, CA 90035

Kousha Berokim, Esq.
Berokim & Duel, P.C.
270 North Canon Drive, Third Floor
Beverly Hills, CA 90210

Berokim & Duel, P.C.
C/O Kousha Berokim, Esq.
270 North Canon Drive, Third Floor
Beverly Hills, CA 90210

☐ Service information continued on attached page

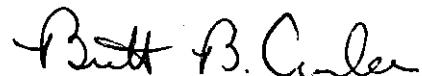
3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 6, 2018
Date

Brett B. Curlee
Printed Name


Signature